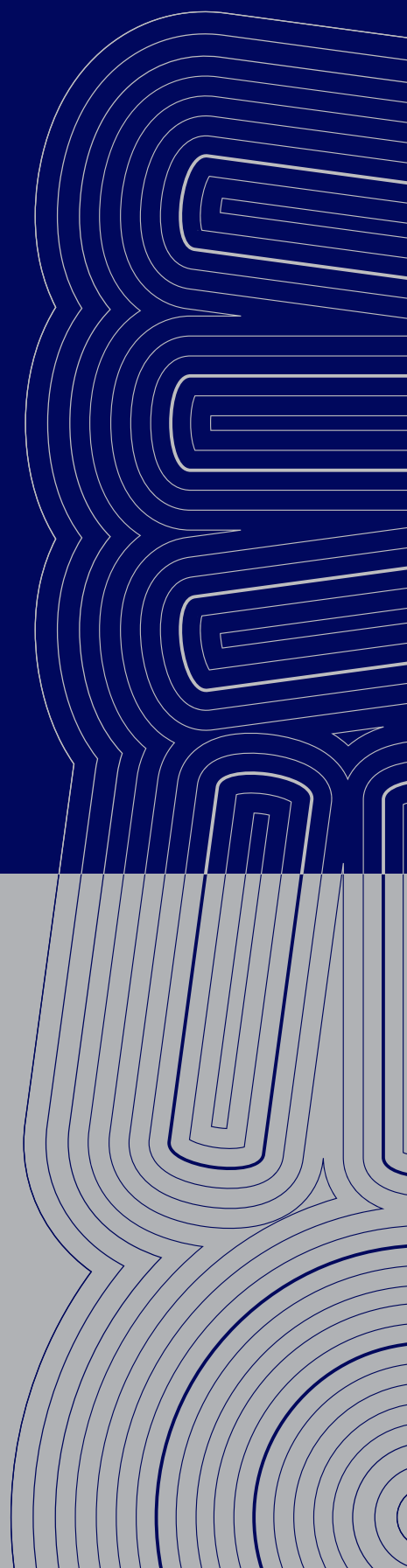


Code of Good Conduct for
**Preventing and
Combating
Harassment at Work**

(Art.127 no 1 *k*) of the Labour Code)

MEO Group



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Preamble

1. Article 29 of the Labour Code prohibits “the practice of harassment” in any possible forms, including sexual harassment.
Law 73/2017 of 16 August introduced new rules aimed at strengthening the prevention of and fight against harassment, namely, the one that requires companies with seven or more employees to adopt codes of conduct geared towards this purpose. In effect, Article 127(k) and (l) of the Labour Code require employers to adopt codes of good conduct for preventing and combating harassment at work and to initiate disciplinary proceedings whenever they become aware of situations of harassment at work.
2. The principles of conduct and rules of an ethical nature of MEO SGPS and its subsidiaries are part of a set of fundamental values that mark their identity, distinguish them in the business world and always govern their activity. These principles are also included in the Code of Ethics, widely publicised among employees.
3. To complement the Code of Ethics and comply with the provisions of Law no. 73/2017 of 16 August, MEO SGPS and its subsidiaries have also adopted this Code of Good Conduct, which establishes guidelines on professional conduct relating to the prevention and combating of harassment at work, applicable to all its employees.

CHAPTER I

GENERAL PROVISIONS

CLAUSE 1

Object

This Code of Good Conduct sets out principles of action and rules of professional conduct aimed at preventing and combating harassment in the workplace. Its intention is to make people aware of, avoid, identify, eliminate, and punish situations and behaviours that could constitute harassment at work.

CLAUSE 2

Scope of application

This Code applies to all persons who work at MEO SGPS, and at each of the Subsidiaries, meaning all employees, members of corporate bodies and holders of management and leadership positions, responsible for any services or persons and those who do not have any hierarchical functions over any other employees. It also includes employees who provide services on behalf of MEO SGPS or any of its subsidiaries, even if they are not part of the company's staff.

CLAUSE 3

General principles

1. MEO SGPS and its Subsidiaries consider inadmissible, without any degree of tolerance, any conduct that qualifies as harassment at work, on the part of its employees towards colleagues, customers, suppliers, partners or any other persons with whom they interact.
2. Any practices or acts that may constitute or be perceived as harassment, as set out in the following clause and article 29, no. 2 and no. 3 of the Labour Code, are prohibited.
3. MEO SGPS and its subsidiaries condemn any act of abuse of power that constitutes harassment at work and have mechanisms in place to promote a healthy working environment that enhances people's dignity, free from harassment, abuse, violence, or any other form of exploitation associated with work.

CLAUSE 4

Concept

1. Harassment is defined as unwanted behaviour, based on discrimination, practised at the time of access to employment or during employment, work or vocational training, with the aim or effect of disturbing or embarrassing a person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.
2. Unwanted verbal, non-verbal or physical behaviour of a sexual nature with the aim or effect referred to in the previous paragraph constitutes sexual harassment.
3. Harassment is characterised by intentionality and repetition.

CHAPTER II

INTERNAL PROCEDURE

CLAUSE 5

Whistleblowing and whistleblower protection

1. Employees who believe they are the victim of behaviour considered to be harassment at work, or any employee who is a witness to it, must report the situation to the People and Organisation Department or report it via the “Communication of Undue Practices” channel on the corporate intranet.
2. Any worker has a duty to prevent and stop any acts of harassment of which he or she becomes aware, namely by reporting them, under the terms of the previous paragraph to ascertain the veracity of the facts and, if applicable, initiating the appropriate disciplinary procedure or any other procedure that may be appropriate in the case.
3. The information transmitted by the employee for all the parties involved and their respective facts is considered “Confidential” and treated with the utmost discretion.

CLAUSE 6

Initiation of disciplinary proceedings

1. MEO SGPS and Subsidiaries undertake, in compliance with the provisions of article 127, paragraph 1, subparagraph I) of the Labour Code, to initiate disciplinary proceedings whenever they become aware of alleged harassment situations of at work.
2. Without prejudice to the exercise of the right to an adversarial hearing, the complainant and the witnesses indicated by them may not be disciplined based on statements or facts contained in the case file of any proceedings initiated for harassment until a final judgement has been handed down unless they act with intent.
3. MEO SGPS and Subsidiaries will take disciplinary or legal action regarding intentionally false, abusive, and bad-faith accusations of harassment.
4. All employees involved in proceedings relating to harassment at work are obliged to act in accordance with principles of good faith, maintain confidentiality, discretion, secrecy, and impartiality, respect the dignity of the individual, and not to disclose any information to which they have access in the context of such proceedings.

CLAUSE 7

Preventive measures

MEO SGPS and Subsidiaries undertake to implement new measures and procedures with the specific purpose of preventing harassment at work. They promote of behavioural training and develop awareness-raising actions that enable identification of risk factors for the occurrence of harassment, or even the occurrence of potential cases of harassment, through consultations with employees.

CHAPTER III

FINAL PROVISIONS

CLAUSE 8

Disclosure

MEO SGPS and each of the Subsidiaries promote the dissemination of this Code of Conduct to all employees, namely through the respective internet site and intranet, to consolidate the application of the principles and the adoption of the behaviours established therein.

CLAUSE 9

Entry into force

This Code of Conduct comes into force immediately after it has been publicised to employees.

CLAUSE 10

Review

This Code of Conduct will be regularly reviewed whenever changes in circumstances warrant it.

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